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12 *Attorneys for Claimant Battle Born Investments Company, LLC*

13
 14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 Approximately 69,370 Bitcoin (BTC),
 21 Bitcoin Gold (BTG), Bitcoin SV (BSV), and
 22 Bitcoin Cash (BCH) seized from
 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hb
 23 hx,

24 Defendant.

25 BATTLE BORN INVESTMENTS
 26 COMPANY, LLC.

27 Claimant.
 28

Case No. 20-7811-RS

**VERIFIED CLAIM AND STATEMENT
 OF INTEREST BY BATTLE BORN
 INVESTMENTS COMPANY, LLC**

Judge: Hon. Richard Seeborg

Courtroom: 3

Case Filed: November 5, 2020

FAC Filed: November 20, 2020

Trial Date: TBD


VERIFIED CLAIM AND STATEMENT OF INTEREST

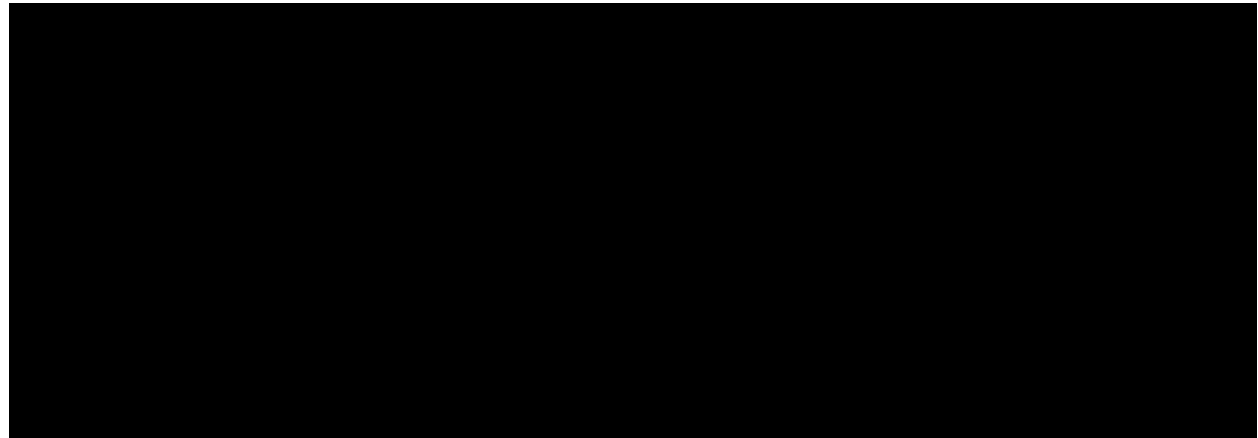
NOTICE OF CLAIM

Pursuant to 18 USC, sections 983(a)(4)(A) and Rules C(6) and G(5) of the Federal Supplemental Rules for Admiralty or Maritime Claims or Forfeiture Actions, claimant Battle Born Investments Company, LLC (“Claimant Battle Born” or “Claimant”) hereby timely claims an interest in all or a portion of the defendant properties that are the subject of this forfeiture action brought by the United States of America (the “Plaintiff”).

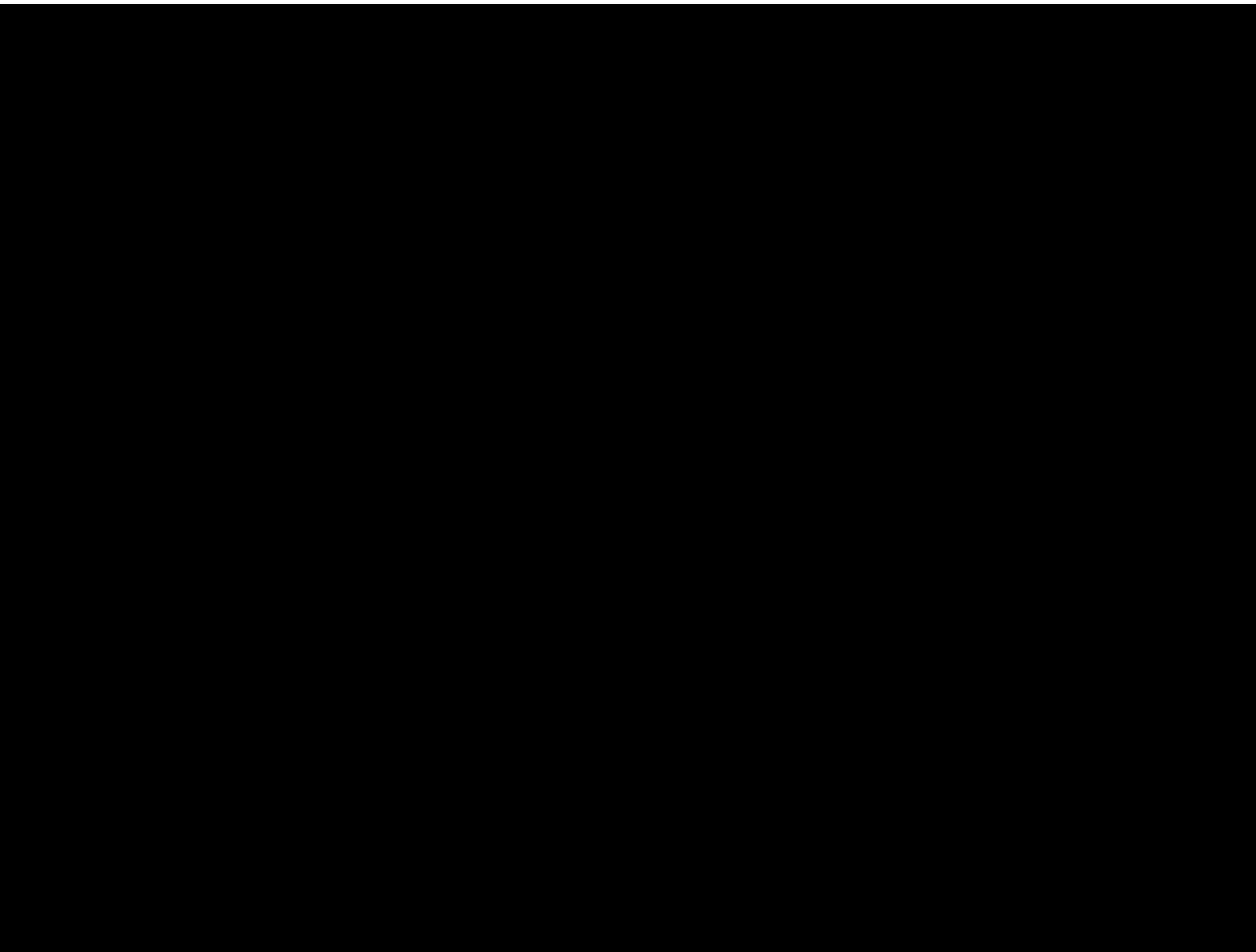
CLAIM

1. Claimant Battle Born is a Nevada Limited Liability Company, located at 10170 W Tropicana Ave, Suite 156-290, Las Vegas, NV 89148.





8. Claimant Battle Born claims an interest in Defendant Property, approximately 69,370 BTC Bitcoin (“BTC”), Bitcoin Gold (“BTG”), Bitcoin SV (“BSV”), Bitcoin Cash (“BCH”), and future Bitcoin hard forks (collectively the “Bitcoin”) seized from Individual X’s wallet number 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx (the “1HQ3 wallet”) and currently in the possession of the Plaintiff.



1 13. Claimant is further informed and believes that the Plaintiff took possession of the
2 Defendant Property by consent agreement from Individual X on or about November 3, 2020,

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 14. Claimant asserts that it currently owns all right, title and interest in and to the
7 Defendant Property that were formerly held in accounts owned by Individual X, but Claimant
8 requires additional information, that is currently not publicly available, to determine if the

9 [REDACTED]
10 [REDACTED]

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 16. Claimant Battle Born claims an interest in the Defendant Property as an innocent
16 “owner,” [REDACTED]

17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 17. Claimant Battle Born is also a “victim” within the meaning of 28 CFR § 9.2.

23 18. Claimant Battle Born contests forfeiture of the Defendant Property and prays that
24 this Court enjoin the liquidation of the Defendant Property in this action prior to the full
25 adjudication of Claimant Battle Born’s right, title and interest in and to the Defendant Property,
26 and seeks the return of the Defendant Property (and any other portion of Defendant property that
27 belongs to Claimant for which insufficient information is available insofar as no Notice of
28

Forfeiture has been provided to Claimant) to Claimant, the rightful owner of such Property by

[REDACTED]

Dated: March 16, 2021

FOX ROTHSCHILD LLP

By: /s/ Jaemin Chang

JAEMIN CHANG

JEFF NICHOLAS (Pro Hac Vice To Be Filed)

Dated: March 16, 2021

THE LAW OFFICES OF GUY A. LEWIS

By: /s/ Guy A. Lewis

GUY A. LEWIS

(Pro Hac Vice To Be Filed)

VERIFICATION

I, the undersigned, certify and declare that I have read the foregoing Verified Notice of Claim and know its contents. The matters stated in the foregoing document are true of my own knowledge and belief except as to those matters explicitly stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. I understand that a false statement or claim may subject a person to prosecution.

Dated: March 16, 2021

BATTLE BORN INVESTMENTS COMPANY, LLC

By: _____


Jay Bloom, Manager
SJC VENTURES HOLDING LLC